

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

CHRISTOPHE STERCKX, Individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

LUCKIN COFFEE INC., JENNY ZHIYA  
QIUAN, REINOUT HENDRIK SCHAKEL,  
CHARLES ZHENGYAO LU, JIAN LIU,  
JINYI GUO, HUI LI, ERHAI LIU, CREDIT  
SUISSE SECURITIES (USA) LLC, MORGAN  
STANLEY & CO. LLC, CHINA  
INTERNATIONAL CAPITAL  
CORPORATION HONG KONG SECURITIES  
LIMITED, HAITONG INTERNATIONAL  
SECURITIES COMPANY LIMITED,  
KEYBANC CAPITAL MARKETS INC., and  
NEEDHAM & COMPANY, LLC,

Defendants.

Case No. 1:20-cv-01677

CLASS ACTION

**NOTICE OF MOTION OF WEI ZUO FOR APPOINTMENT AS LEAD PLAINTIFF  
AND APPOINTMENT OF LEAD COUNSEL**

PLEASE TAKE NOTICE that on a date and time that may be set by the Court, before the Honorable Kiyo A. Matsumoto, at the United States District Court for the Eastern District of New York, located at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, NY 11201, Wei Zuo will respectfully move this Court for entry of an Order, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”): (1) appointing Mr. Zuo as Lead Plaintiff; (2) approving his selection of Block & Leviton LLP as Lead Counsel for the class; (3) consolidating the other securities fraud class action lawsuit against Luckin Coffee Inc. filed in this district under the above-captioned docket; and (4) for any further relief which the Court may deem just and proper.

This Motion is made on the grounds that Mr. Zuo believes that he is “the most adequate plaintiff” under the PSLRA and should, therefore, be appointed Lead Plaintiff. Specifically, Mr. Zuo believes that he has the largest financial interest in the relief sought by the Class in this action by virtue of, among other things, the significant losses he incurred on his class period transactions in Luckin Coffee Inc. securities. Further, Mr. Zuo satisfies the requirements of Rule 23 of the Federal Rules of Civil Procedure because his claims are typical of other Class members’ claims and because he will fairly and adequately represent the interests of the Class.

This Motion is based upon the accompanying Memorandum of Law in support thereof, the Declaration of Jeffrey C. Block filed herewith, Mr. Zuo’s Declaration filed herewith, the pleadings and other filings herein, and such other written or oral argument as may be permitted by the Court.

WHEREFORE, Mr. Zuo respectfully requests that the Court: (1) appoint him as Lead Plaintiff pursuant to the PSLRA; (2) approve his selection of Block & Leviton LLP as Lead Counsel for the Class; (3) consolidating the other securities fraud class action lawsuit against

Luckin Coffee Inc. filed in this district under the above-captioned docket; and (4) grant any such further relief as the Court may deem just and proper.

Dated: April 13, 2020

Respectfully submitted,

/s/ Jeffrey C. Block

Jeffrey C. Block

Jacob A. Walker, *pro hac vice* to be filed

Stephen J. Teti, *pro hac vice* to be filed

**BLOCK & LEVITON LLP**

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*Attorneys for Mr. Zuo and*

*Proposed Lead Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 13, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

/s/ Jeffrey C. Block  
Jeffrey C. Block